

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Purdue Pharma L.P., *et al.*,

Case No.: 19-23649

(SHL) (Chapter 11)

Debtors.

(Jointly Administered)

**MOTION TO SUBSTITUTE COUNSEL
PURSUANT TO LOCAL BANKRUPTCY RULE 2090-1(e)**

This motion seeks, pursuant to Local Bankruptcy Rule 2090-1(e), authorization for the New York State Department of Financial Services (“DFS”) to substitute Linda Donahue, Deputy General Counsel for Litigation at DFS, as its counsel of record in place of Nicolas G. Keller, Assistant Deputy Superintendent at DFS. Mr. Keller states that he is concluding his employment at DFS at the end of business on July 15, 2022, and therefore cannot remain counsel in this case after that date. DFS and both attorneys consent to this substitution, which will not impact the representation of DFS or result in any prejudice or delay to any party in these proceedings.

Contact information for new counsel, who is admitted to practice in this court, is as follows:

Name:	Linda Donahue
Employer:	New York State Department of Financial Services
Address:	1 State Street, New York, NY 10004
Telephone:	212-709-1641
E-mail:	linda.donahue@dfs.ny.gov

WHEREFORE, for the reasons stated herein, DFS respectfully requests the Court grant this motion and order the substitution of Ms. Donahue as counsel of record for DFS in this matter and the withdrawal of Mr. Keller as counsel of record such that he no longer receives electronic

notices from the Court's CM/ECF system in this case. A proposed consent order granting the relief requested herein is annexed as Exhibit A.

Dated: July 15, 2022
New York, New York

NEW YORK STATE
DEPARTMENT OF FINANCIAL SERVICES

By: /s/ Nicolas G. Keller
Nicolas G. Keller
Assistant Deputy Superintendent
Consumer Protection and Financial Enforcement
One State Street
New York, NY 10004
(212) 480-4668
nicolas.keller@dfs.ny.gov

CERTIFICATE OF SERVICE

I, Nicolas G. Keller, certify that on July 15, 2022, I caused a true and correct copy of the foregoing Motion to Substitute Counsel Pursuant to Local Bankruptcy Rule 2090-1(e) to be served through the Court's ECF system to all parties of record.

Dated: New York, New York
July 15, 2022

/s/ Nicolas G. Keller
Nicolas G. Keller